

WESTAR INVESTORS GROUP, LLC,	§	IN THE COUNTY COURT
SUHAIL BAWA, and SALEEM MAKANI	§	
	§	
Plaintiffs,	§	AT LAW NUMBER SIX (6)
	§	
v.	§	
	§	EL PASO COUNTY, TEXAS
THE GATEWAY VENTURES, LLC, PDG	§	
PRESTIGE, INC., MICHAEL DIXSON,	§	
SURESH KUMAR, and BANKIM BHATT	§	
	§	
Defendants.	§	

**MOTION TO EXTEND THE TIME LIMIT OF DEPOSITIONS**

Defendant, Suresh Kumar (“Kumar”), files this, his Motion to Extend the Time Limit of Depositions for Plaintiffs Suhail Bawa and Saleem Makani (collectively referred to herein as “Plaintiffs”), and, in support thereof, would respectfully show as follows:

1. In accordance with Rule 199.5(c), generally, each party has the right to examine or cross-examine a witness for up to six hours. Tex. R. Civ. Pro. 199.5(c). This matter is document-intensive. Through the written discovery that has been completed to date, voluminous documents have been produced. Further, it is anticipated that additional documents will be produced.
2. The six-hour time limit will create a burden on Kumar in his examination of Plaintiffs. As such, Kumar requests that the Court allow each party up to no more than 12 hours to examine and/or cross examine Plaintiffs.
3. Kumar prays that notices be issued, that a hearing be set for this motion, that the Court extend the time limitation for the depositions of Plaintiffs and for such other and further relief to which Kumar is justly entitled.

**GORDON DAVIS JOHNSON & SHANE P.C.**

/s/Harrel L. Davis III

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Attorney for Defendant  
Suresh Kumar

**CERTIFICATE OF SERVICE**

In accordance with the Texas Rules of Civil Procedure, I hereby certify that on October 26, 2020, the foregoing document was electronically filed with the clerk of the court and a true and correct copy was electronically served on the parties/attorneys of record listed through the [efile.txcourts.gov](http://efile.txcourts.gov) system.

/s/Harrel L. Davis III

Harrel L. Davis III